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November 30, 2005

VIA ECFS and HAND DELIVERY

Nazifa Sawez
Federal Communications Commission
Room 2-A726
445 12th Street, SW
Washington, DC 20554

Re: **MB Docket No. 05-317**
TELEVISION STATION SECTION 339(a)(2)(D)(vii) WAVIER REQUEST

Dear Ms. Sawez:

Piedmont Television of Springfield License LLC (Piedmont-Springfield), the permittee of KSPR-DT/35630, Springfield, Missouri and Piedmont Television of Savannah License LLC ("Piedmont-Savannah"), the permittee of WJCL-DT/37174, Savannah, Georgia, through undersigned counsel, hereby file this request for waiver of the signal testing of digital signals pursuant to Section 339(a)(2)(D) of the Communications Act of 1934, as amended by the Satellite Home Viewer Extension and Reauthorization Act of 2004 (the "Act").

Both Piedmont-Springfield and Piedmont-Savannah timely filed and have pending extension/waiver requests of the July 1, 2005 digital replication/maximization deadline applicable to network stations in the top 100 markets (FCC File Nos. BEDSTA-20050629ADT and BEDSTA-20050629ADU). Because the Commission has not found that either KSPR-DT or WJCL-DT has lost interference protection, pursuant to Section 339(a)(2)(D)(vii)(BB) of the Act, no triggering event has occurred which would allow for distant digital signal testing to occur.

Nonetheless, in an abundance of caution, the instant waiver request is filed to the extent that such a waiver is necessary to protect against any distant digital signal testing. Since both stations have pending applications to further extend the replication/maximization deadline, the previously authorized extensions and pending extension requests qualify as a force majeure event under

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Section 339 of the Act. 47 U.S.C. §339(a)(2)(D)(viii)(III). In addition, the Act also provides a basis for waiver for those licensees who suffer reduced coverage due to antenna mounting issues which result in a substantial decrease in coverage area. *See* 47 U.S.C. §339(a)(2)(D)(viii)(IV). Piedmont-Springfield notes that its current DTV antenna is not mounted on its main tower, but is mounted on an auxiliary tower (See FCC File No. BDSTA-20040316AMH), which results in a substantial decrease in coverage area.

Piedmont-Springfield and Piedmont-Savannah respectfully submit that they are excluded from distant digital signal testing, but to the extent deemed necessary, file the instant waiver request for the reasons stated above.

Sincerely,

Joseph M. Di Scipio

Joseph M. Di Scipio
Counsel for Piedmont Television of
Springfield License LLC and Piedmont
Television of Savannah License LLC